

# **EXHIBIT 4**

**From:** Amy L. Barrette

**Sent:** Wednesday, January 22, 2025 12:05 PM

**To:** Christopher G. Mavros <cgmavros@zarwin.com>; Rubinson, Michelle <mrubinson@smbb.com>; Davis, Jeff <jsdavis@bradley.com>; Jessica Riddle <jriddle@zarwin.com>; Budner, Michael <MBudner@smbb.com>; Matthew Pilsner <matthew.pilsner@bipc.com>; Howard, Ty <thoward@bradley.com>; Tara Klingensmith <tara.klingensmith@bipc.com>; Bell, Andy <abell@bradley.com>; Duffy, Andrew R. <ADuffy@smbb.com>; Max Dehon <mdehon@smbb.com>

**Cc:** Chante DePersia <cndepersia@zarwin.com>; delylechappellz1579379@smb.filevineapp.com

**Subject:** RE: updated list RE: Chappell v Precision Forum's request for deposition dates in January and February

**Importance:** High

Michael,

Following up on Chris's email requesting the deposition of Ms. Chappell, Coterra wants to conduct the deposition in person. We are happy to make our Harrisburg office available as it is in the Middle District. Or, it may be more convenient for her to fly to Pittsburgh, so we could do it here as well. Please let me know what dates work for her appearance so that we can get the deposition notice out.

Thanks,

Amy

**Amy Barrette**  
Shareholder

Union Trust Building  
501 Grant Street, Suite 200  
Pittsburgh, PA 15219-4413  
412 562 1626 (o)  
[amy.barrette@bipc.com](mailto:amy.barrette@bipc.com)

**Buchanan**

[vCard](#) | [Bio](#) | [BIPC.com](#) | [Twitter](#) | [LinkedIn](#)

**From:** Christopher G. Mavros <[cgmavros@zarwin.com](mailto:cgmavros@zarwin.com)>

**Sent:** Thursday, January 9, 2025 12:46 PM

**To:** Robinson, Michelle <[mrubinson@smbb.com](mailto:mrubinson@smbb.com)>; Davis, Jeff <[jsdavis@bradley.com](mailto:jsdavis@bradley.com)>; Amy L. Barrette <[amy.barrette@bipc.com](mailto:amy.barrette@bipc.com)>; Jessica Riddle <[jriddle@zarwin.com](mailto:jriddle@zarwin.com)>; Budner, Michael <[MBudner@smbb.com](mailto:MBudner@smbb.com)>; Matthew Pilsner <[matthew.pilsner@bipc.com](mailto:matthew.pilsner@bipc.com)>; Howard, Ty <[thoward@bradley.com](mailto:thoward@bradley.com)>; Tara Klingensmith <[tara.klingensmith@bipc.com](mailto:tara.klingensmith@bipc.com)>; Bell, Andy <[abell@bradley.com](mailto:abell@bradley.com)>; Duffy, Andrew R. <[ADuffy@smbb.com](mailto:ADuffy@smbb.com)>; Max Dehon <[mdehon@smbb.com](mailto:mdehon@smbb.com)>

**Cc:** Chante DePersia <[cndepersia@zarwin.com](mailto:cndepersia@zarwin.com)>; [delylechappellz1579379@smb.filevineapp.com](mailto:delylechappellz1579379@smb.filevineapp.com); Christopher G. Mavros <[cgmavros@zarwin.com](mailto:cgmavros@zarwin.com)>

**Subject:** RE: updated list RE: Chappell v Precision Forum's request for deposition dates in January and February

I am unavailable 3/4 – 10.

With the DED on 3/10, please provide dates for Mrs. Chappell's deposition as well or we can use one of the dates we come up with.

Thanks,  
Chris



**Christopher G. Mavros, Esq.**

One Commerce Square  
2005 Market Street | 16<sup>th</sup> Floor | Philadelphia, PA 19103-7042  
Main Number: 215.569.2800 | Direct Dial: [267.765.7341](tel:267.765.7341)  
Main Fax: 267.386.3306  
Email: [cgmavros@zarwin.com](mailto:cgmavros@zarwin.com)



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**From:** Robinson, Michelle <[mrubinson@smbb.com](mailto:mrubinson@smbb.com)>  
**Sent:** Thursday, January 9, 2025 12:38 PM  
**To:** Davis, Jeff <[jsdavis@bradley.com](mailto:jsdavis@bradley.com)>; Amy L. Barrette <[amy.barrette@bipc.com](mailto:amy.barrette@bipc.com)>; Jessica Riddle <[jriddle@zarwin.com](mailto:jriddle@zarwin.com)>; Budner, Michael <[MBudner@smbb.com](mailto:MBudner@smbb.com)>; Matthew Pilsner <[matthew.pilsner@bipc.com](mailto:matthew.pilsner@bipc.com)>; Howard, Ty <[thoward@bradley.com](mailto:thoward@bradley.com)>; Tara Klingensmith <[tara.klingensmith@bipc.com](mailto:tara.klingensmith@bipc.com)>; Bell, Andy <[abell@bradley.com](mailto:abell@bradley.com)>; Duffy, Andrew R. <[ADuffy@smbb.com](mailto:ADuffy@smbb.com)>; Max Dehon <[mdehon@smbb.com](mailto:mdehon@smbb.com)>  
**Cc:** Chante DePersia <[cndepersia@zarwin.com](mailto:cndepersia@zarwin.com)>; Christopher G. Mavros <[cgmavros@zarwin.com](mailto:cgmavros@zarwin.com)>; Robinson, Michelle <[mrubinson@smbb.com](mailto:mrubinson@smbb.com)>; [delylechappellz1579379@smb.filevineapp.com](mailto:delylechappellz1579379@smb.filevineapp.com)  
**Subject:** updated list RE: Chappell v Precision Forum's request for deposition dates in January and February

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Counsel,

\*I notice our associate Max Dehon, who works with Drew and Mike- is not on any of these threads – so I am adding him.

Please use this updated list, so Max does not feel left out of all the fun.  
Thanks.

## Michelle Robinson

Litigation Paralegal



One Liberty Place, 1650 Market Street, 52<sup>nd</sup> Floor,  
Philadelphia, PA 19103

+1 215.399.9293 (direct) | +1 215.496.0999 (fax) | + 215-260-9832 (cell)  
[mrubinson@smbb.com](mailto:mrubinson@smbb.com) | [www.smbb.com](http://www.smbb.com)

**From:** Robinson, Michelle <[mrubinson@smbb.com](mailto:mrubinson@smbb.com)>  
**Sent:** Thursday, January 9, 2025 12:30 PM  
**To:** Davis, Jeff <[jsdavis@bradley.com](mailto:jsdavis@bradley.com)>; Amy L. Barrette <[amy.barrette@bipc.com](mailto:amy.barrette@bipc.com)>; Jessica Riddle <[jriddle@zarwin.com](mailto:jriddle@zarwin.com)>; Budner, Michael <[MBudner@smbb.com](mailto:MBudner@smbb.com)>; Matthew Pilsner <[matthew.pilsner@bipc.com](mailto:matthew.pilsner@bipc.com)>; Howard, Ty <[thoward@bradley.com](mailto:thoward@bradley.com)>; Tara Klingensmith

<[tara.klingensmith@bipc.com](mailto:tara.klingensmith@bipc.com)>; Bell, Andy <[abell@bradley.com](mailto:abell@bradley.com)>; Duffy, Andrew R.  
<[ADuffy@smbb.com](mailto:ADuffy@smbb.com)>

**Cc:** Chante DePersia <[cndepersia@zarwin.com](mailto:cndepersia@zarwin.com)>; Christopher G. Mavros <[cgmavros@zarwin.com](mailto:cgmavros@zarwin.com)>;  
Rubinson, Michelle <[mrubinson@smbb.com](mailto:mrubinson@smbb.com)>

**Subject:** RE: Chappell v Precision Forum's request for deposition dates in January and February

Counsel, good afternoon:

By way of a summary for scheduling, I would like to confirm the below:

Broady Webster is confirmed for 1/28/25 at 10am. Zoom.

Frank Estes is confirmed for 1/30/25 at 10am. Zoom.

The following witnesses are ideally, to be slotted into the available dates below (that Coterra and Forum are available). Zoom only:

**DEPONENTS:**

Craig Watts  
Bob Goodwin  
Troy Holliday  
Matt Wallace  
Magella Mainguy  
Kingsley Meniffee  
Jeremi Wagner  
Bailey Jeffords  
Mark Bennett  
Joseph Fox  
Justin Guthrie

**AVAILABLE DATES:**

- February 18
- February 19
- February 24
- February 25
- March 3
- March 4
- March 5
- March 6
- March 7
- March 10

*Plaintiffs are actively working on confirming availability of the above dates asap.*

**Michelle Robinson**

Litigation Paralegal



One Liberty Place, 1650 Market Street, 52<sup>nd</sup> Floor,  
Philadelphia, PA 19103

+1 215.399.9293 (direct) | +1 215.496.0999 (fax) | + 215-260-9832 (cell)  
[mrubinson@smbb.com](mailto:mrubinson@smbb.com) | [www.smbb.com](http://www.smbb.com)

**From:** Davis, Jeff <[jsdavis@bradley.com](mailto:jsdavis@bradley.com)>

**Sent:** Thursday, January 9, 2025 12:04 PM

**To:** Amy L. Barrette <[amy.barrette@bipc.com](mailto:amy.barrette@bipc.com)>; Jessica Riddle <[jriddle@zarwin.com](mailto:jriddle@zarwin.com)>; Budner, Michael <[MBudner@smbb.com](mailto:MBudner@smbb.com)>; Matthew Pilsner <[matthew.pilsner@bipc.com](mailto:matthew.pilsner@bipc.com)>; Howard, Ty <[thoward@bradley.com](mailto:thoward@bradley.com)>; Tara Klingensmith <[tara.klingensmith@bipc.com](mailto:tara.klingensmith@bipc.com)>; Robinson, Michelle <[mrubinson@smbb.com](mailto:mrubinson@smbb.com)>; Bell, Andy <[abell@bradley.com](mailto:abell@bradley.com)>; Duffy, Andrew R. <[ADuffy@smbb.com](mailto:ADuffy@smbb.com)>

**Cc:** Chante DePersia <[cndepersia@zarwin.com](mailto:cndepersia@zarwin.com)>; Christopher G. Mavros <[cgmavros@zarwin.com](mailto:cgmavros@zarwin.com)>

**Subject:** RE: Chappell v Precision Forum's request for deposition dates in December 2024

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Chris & Michael:

Of the dates provided by Amy, I am **currently** available on the following – assuming that the requested depositions will be taken remotely:

- February 18
- February 19
- February 24
- February 25
- March 3
- March 4
- March 5
- March 6
- March 7
- March 10

**From:** Amy L. Barrette <[amy.barrette@bipc.com](mailto:amy.barrette@bipc.com)>

**Sent:** Thursday, January 9, 2025 10:49 AM

**To:** Jessica Riddle <[jriddle@zarwin.com](mailto:jriddle@zarwin.com)>; Davis, Jeff <[jsdavis@bradley.com](mailto:jsdavis@bradley.com)>; Budner, Michael <[MBudner@smbb.com](mailto:MBudner@smbb.com)>; Matthew Pilsner <[matthew.pilsner@bipc.com](mailto:matthew.pilsner@bipc.com)>; Howard, Ty

<[thoward@bradley.com](mailto:thoward@bradley.com)>; Tara Klingensmith <[tara.klingensmith@bipc.com](mailto:tara.klingensmith@bipc.com)>; Robinson, Michelle <[mrubinson@smbb.com](mailto:mrubinson@smbb.com)>; Bell, Andy <[abell@bradley.com](mailto:abell@bradley.com)>; Duffy, Andrew R. <[ADuffy@smbb.com](mailto:ADuffy@smbb.com)>  
**Cc:** Chante DePersia <[cndepersia@zarwin.com](mailto:cndepersia@zarwin.com)>; Christopher G. Mavros <[cgmavros@zarwin.com](mailto:cgmavros@zarwin.com)>; Amy L. Barrette <[amy.barrette@bipc.com](mailto:amy.barrette@bipc.com)>

**Subject:** RE: Chappell v Precision Forum's request for deposition dates in December 2024

**Importance:** High

Chris,

Coterra is available to participate in the depositions for the 10 witnesses identified below on the following dates: February 3-7, 10-11, 17-21, 24-28 and March 3-7 and 10. Given that these are not likely full 7 hour depositions, it makes sense to try to schedule more than one per day.

Amy

**Amy Barrette**  
Shareholder

Union Trust Building  
501 Grant Street, Suite 200  
Pittsburgh, PA 15219-4413  
412 562 1626 (o)  
[amy.barrette@bipc.com](mailto:amy.barrette@bipc.com)

**Buchanan**

[vCard](#) | [Bio](#) | [BIPC.com](#) | [Twitter](#) | [LinkedIn](#)

**From:** Jessica Riddle <[jriddle@zarwin.com](mailto:jriddle@zarwin.com)>

**Sent:** Thursday, January 9, 2025 11:09 AM

**To:** Amy L. Barrette <[amy.barrette@bipc.com](mailto:amy.barrette@bipc.com)>; Davis, Jeff <[jsdavis@bradley.com](mailto:jsdavis@bradley.com)>; Budner, Michael <[MBudner@smbb.com](mailto:MBudner@smbb.com)>; Matthew Pilsner <[matthew.pilsner@bipc.com](mailto:matthew.pilsner@bipc.com)>; Howard, Ty <[thoward@bradley.com](mailto:thoward@bradley.com)>; Tara Klingensmith <[tara.klingensmith@bipc.com](mailto:tara.klingensmith@bipc.com)>; Robinson, Michelle <[mrubinson@smbb.com](mailto:mrubinson@smbb.com)>; Bell, Andy <[abell@bradley.com](mailto:abell@bradley.com)>; Duffy, Andrew R. <[ADuffy@smbb.com](mailto:ADuffy@smbb.com)>

**Cc:** Chante DePersia <[cndepersia@zarwin.com](mailto:cndepersia@zarwin.com)>; Christopher G. Mavros <[cgmavros@zarwin.com](mailto:cgmavros@zarwin.com)>

**Subject:** RE: Chappell v Precision Forum's request for deposition dates in December 2024

Good Morning,

I have not received a response from anyone except Amy, please see the below & provide dates. We would like to schedule the deposition of Bob Goodwin, Troy Holliday, Matt Wallace, Magella Mainguy, Kingsley Meniffee, Jeremi Wagner, Bailey Jeffords, Mark Bennett, Joseph Fox, and Justin Guthrie.

Additionally, attached are the deposition notices for Broady Webster & Frank Estes.

Thank you!



**Jessica Riddle, Paralegal**

One Commerce Square  
2005 Market Street | 16<sup>th</sup> Floor | Philadelphia, PA 19103-7042  
Direct Dial: 215.569.2800 |  
Email: [jriddle@zarwin.com](mailto:jriddle@zarwin.com)



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**From:** Amy L. Barrette <[amy.barrette@bipc.com](mailto:amy.barrette@bipc.com)>  
**Sent:** Monday, December 16, 2024 2:03 PM  
**To:** Jessica Riddle <[jriddle@zarwin.com](mailto:jriddle@zarwin.com)>; Davis, Jeff <[jsdavis@bradley.com](mailto:jsdavis@bradley.com)>; Budner, Michael <[MBudner@smbb.com](mailto:MBudner@smbb.com)>; Matthew Pilsner <[matthew.pilsner@bipc.com](mailto:matthew.pilsner@bipc.com)>; Howard, Ty <[thoward@bradley.com](mailto:thoward@bradley.com)>; Tara Klingensmith <[tara.klingensmith@bipc.com](mailto:tara.klingensmith@bipc.com)>; Robinson, Michelle <[mrubinson@smbb.com](mailto:mrubinson@smbb.com)>; Bell, Andy <[abell@bradley.com](mailto:abell@bradley.com)>; Duffy, Andrew R. <[ADuffy@smbb.com](mailto:ADuffy@smbb.com)>  
**Cc:** Chante DePersia <[cndepersia@zarwin.com](mailto:cndepersia@zarwin.com)>; Christopher G. Mavros <[cgmavros@zarwin.com](mailto:cgmavros@zarwin.com)>  
**Subject:** RE: Chappell v Precision Forum's request for deposition dates in December 2024  
**Importance:** High

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Chris,

Brody Webster is available for his deposition on January 28, 2025. Please let me know as soon as possible whether you plan to proceed on that day. For the remainder of the depositions, I am available to participate on the following dates: January 30, February 3-7, Feb 17-21, and Feb 24-28.

**Amy Barrette**  
Shareholder

Union Trust Building  
501 Grant Street, Suite 200  
Pittsburgh, PA 15219-4413  
412 562 1626 (o)  
[amy.barrette@bipc.com](mailto:amy.barrette@bipc.com)

**Buchanan**

[vCard](#) | [Bio](#) | [BIPC.com](#) | [Twitter](#) | [LinkedIn](#)



**From:** Jessica Riddle <[jriddle@zarwin.com](mailto:jriddle@zarwin.com)>

**Sent:** Monday, December 16, 2024 11:14 AM

**To:** Davis, Jeff <[jsdavis@bradley.com](mailto:jsdavis@bradley.com)>; Amy L. Barrette <[amy.barrette@bipc.com](mailto:amy.barrette@bipc.com)>; Budner, Michael <[MBudner@smbb.com](mailto:MBudner@smbb.com)>; Matthew Pilsner <[matthew.pilsner@bipc.com](mailto:matthew.pilsner@bipc.com)>; Howard, Ty <[thoward@bradley.com](mailto:thoward@bradley.com)>; Tara Klingensmith <[tara.klingensmith@bipc.com](mailto:tara.klingensmith@bipc.com)>; Robinson, Michelle <[mrubinson@smbb.com](mailto:mrubinson@smbb.com)>; Bell, Andy <[abell@bradley.com](mailto:abell@bradley.com)>; Duffy, Andrew R. <[ADuffy@smbb.com](mailto:ADuffy@smbb.com)>

**Cc:** Chante DePersia <[cndepersia@zarwin.com](mailto:cndepersia@zarwin.com)>; Christopher G. Mavros <[cgmavros@zarwin.com](mailto:cgmavros@zarwin.com)>

**Subject:** RE: Chappell v Precision Forum's request for deposition dates in December 2024

Good Morning,

We would like to schedule the deposition of Brody Webster, Bob Goodwin, Troy Holliday, Matt Wallace, Magella Mainguy, Kingsley Menifee, Jeremi Wagner, Bailey Jeffords, Mark Bennett, Joseph Fox, and Justin Guthrie. Please provide availability for late January & February.

Thank you!



**Jessica Riddle, Paralegal**

One Commerce Square  
2005 Market Street | 16<sup>th</sup> Floor | Philadelphia, PA 19103-7042  
Direct Dial: 215.569.2800 |  
Email: [jriddle@zarwin.com](mailto:jriddle@zarwin.com)



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**From:** Davis, Jeff <[jsdavis@bradley.com](mailto:jsdavis@bradley.com)>

**Sent:** Friday, November 8, 2024 10:25 AM

**To:** Amy L. Barrette <[amy.barrette@bipc.com](mailto:amy.barrette@bipc.com)>; Budner, Michael <[MBudner@smbb.com](mailto:MBudner@smbb.com)>; Christopher G. Mavros <[cgmavros@zarwin.com](mailto:cgmavros@zarwin.com)>; Jessica Agger <[jagger@zarwin.com](mailto:jagger@zarwin.com)>; Matthew Pilsner <[matthew.pilsner@bipc.com](mailto:matthew.pilsner@bipc.com)>; Howard, Ty <[thoward@bradley.com](mailto:thoward@bradley.com)>; Tara Klingensmith <[tara.klingensmith@bipc.com](mailto:tara.klingensmith@bipc.com)>; Robinson, Michelle <[mrubinson@smbb.com](mailto:mrubinson@smbb.com)>; Bell, Andy <[abell@bradley.com](mailto:abell@bradley.com)>; Duffy, Andrew R. <[ADuffy@smbb.com](mailto:ADuffy@smbb.com)>

**Cc:** Chante DePersia <[cndepersia@zarwin.com](mailto:cndepersia@zarwin.com)>

**Subject:** RE: Chappell v Precision Forum's request for deposition dates in December 2024

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If it is the 23<sup>rd</sup>, then I am fine with that.

**Jeff Davis**

Partner | [Bradley](#)  
[jsdavis@bradley.com](mailto:jsdavis@bradley.com)  
d: 713.576.0370

**From:** Amy L. Barrette <[amy.barrette@bipc.com](mailto:amy.barrette@bipc.com)>

**Sent:** Friday, November 8, 2024 9:10 AM

**To:** Budner, Michael <[MBudner@smbb.com](mailto:MBudner@smbb.com)>; Davis, Jeff <[jsdavis@bradley.com](mailto:jsdavis@bradley.com)>; Christopher G. Mavros <[cgmavros@zarwin.com](mailto:cgmavros@zarwin.com)>; Jessica Agger <[jagger@zarwin.com](mailto:jagger@zarwin.com)>; Matthew Pilsner <[matthew.pilsner@bipc.com](mailto:matthew.pilsner@bipc.com)>; Howard, Ty <[thoward@bradley.com](mailto:thoward@bradley.com)>; Tara Klingensmith <[tara.klingensmith@bipc.com](mailto:tara.klingensmith@bipc.com)>; Robinson, Michelle <[mrubinson@smbb.com](mailto:mrubinson@smbb.com)>; Bell, Andy <[abell@bradley.com](mailto:abell@bradley.com)>; Duffy, Andrew R. <[ADuffy@smbb.com](mailto:ADuffy@smbb.com)>

**Cc:** Chante DePersia <[cndepersia@zarwin.com](mailto:cndepersia@zarwin.com)>

**Subject:** RE: Chappell v Precision Forum's request for deposition dates in December 2024

**Importance:** High

Jeff,

I haven't received a response from you on the dates proposed below for Mr. Brown. The start time will have to be 3:35 Central time.

Thanks

**Amy Barrette**

**Shareholder**

(she/her)

Union Trust Building  
501 Grant Street, Suite 200  
Pittsburgh, PA 15219-4413  
412 562 1626 (o)  
[amy.barrette@bipc.com](mailto:amy.barrette@bipc.com)

**Buchanan**

[vCard](#) | [Bio](#) | [BIPC.com](#) | [Twitter](#) | [LinkedIn](#)

**From:** Amy L. Barrette <[amy.barrette@bipc.com](mailto:amy.barrette@bipc.com)>

**Sent:** Tuesday, November 5, 2024 12:26 PM

**To:** Budner, Michael <[MBudner@smbb.com](mailto:MBudner@smbb.com)>; Davis, Jeff <[jsdavis@bradley.com](mailto:jsdavis@bradley.com)>; Christopher G. Mavros <[cgmavros@zarwin.com](mailto:cgmavros@zarwin.com)>; Jessica Agger <[jagger@zarwin.com](mailto:jagger@zarwin.com)>; Matthew Pilsner <[matthew.pilsner@bipc.com](mailto:matthew.pilsner@bipc.com)>; Howard, Ty <[thoward@bradley.com](mailto:thoward@bradley.com)>; Tara Klingensmith

<[tara.klingensmith@bipc.com](mailto:tara.klingensmith@bipc.com)>; Robinson, Michelle <[mrubinson@smbb.com](mailto:mrubinson@smbb.com)>; Bell, Andy <[abell@bradley.com](mailto:abell@bradley.com)>; Duffy, Andrew R. <[ADuffy@smbb.com](mailto:ADuffy@smbb.com)>

**Cc:** Chante DePersia <[cndepersia@zarwin.com](mailto:cndepersia@zarwin.com)>; Amy L. Barrette <[amy.barrette@bipc.com](mailto:amy.barrette@bipc.com)>

**Subject:** RE: Chappell v Precision Forum's request for deposition dates in December 2024

Given counsels' schedule conflicts, we will not be able to proceed with Mr. Estes' deposition in December. Do any of you want to proceed with Mr. Brown's deposition the week of the 23<sup>rd</sup> or 30<sup>th</sup> if he is available? I do not want to waste time trying to schedule him during that time if counsel is not available. I also want to eliminate any future suggestion that Coterra delayed depositions.

## Amy Barrette

Shareholder

(she/her)

Union Trust Building  
501 Grant Street, Suite 200  
Pittsburgh, PA 15219-4413  
412 562 1626 (o)  
[amy.barrette@bipc.com](mailto:amy.barrette@bipc.com)

## Buchanan

[vCard](#) | [Bio](#) | [BIPC.com](#) | [Twitter](#) | [LinkedIn](#)

**From:** Budner, Michael <[MBudner@smbb.com](mailto:MBudner@smbb.com)>

**Sent:** Tuesday, November 5, 2024 11:10 AM

**To:** Davis, Jeff <[jsdavis@bradley.com](mailto:jsdavis@bradley.com)>; Amy L. Barrette <[amy.barrette@bipc.com](mailto:amy.barrette@bipc.com)>; Christopher G. Mavros <[cgmavros@zarwin.com](mailto:cgmavros@zarwin.com)>; Jessica Agger <[jagger@zarwin.com](mailto:jagger@zarwin.com)>; Matthew Pilsner <[matthew.pilsner@bipc.com](mailto:matthew.pilsner@bipc.com)>; Howard, Ty <[thoward@bradley.com](mailto:thoward@bradley.com)>; Tara Klingensmith <[tara.klingensmith@bipc.com](mailto:tara.klingensmith@bipc.com)>; Robinson, Michelle <[mrubinson@smbb.com](mailto:mrubinson@smbb.com)>; Bell, Andy <[abell@bradley.com](mailto:abell@bradley.com)>; Duffy, Andrew R. <[ADuffy@smbb.com](mailto:ADuffy@smbb.com)>

**Cc:** Chante DePersia <[cndepersia@zarwin.com](mailto:cndepersia@zarwin.com)>

**Subject:** RE: Chappell v Precision Forum's request for deposition dates in December 2024

I also have a trial that is scheduled to start on 12/9. It's NJ, so it's technically just a listing, but it's our 9<sup>th</sup> or 10<sup>th</sup> listing, so I'm fairly certain that will go, which means I would be unavailable the weeks of 12/9 and 12/16.

## Michael Budner

Partner



One Liberty Place, 1650 Market Street, 52<sup>nd</sup> Floor  
Philadelphia, PA 19103  
+1 215.575.3875 (office) | +1 215.380.9312 (cell)  
[mbudner@smbb.com](mailto:mbudner@smbb.com) | [www.smbb.com](http://www.smbb.com)

**From:** Davis, Jeff <[jsdavis@bradley.com](mailto:jsdavis@bradley.com)>

**Sent:** Tuesday, November 5, 2024 11:07 AM

**To:** Amy L. Barrette <[amy.barrette@bipc.com](mailto:amy.barrette@bipc.com)>; Christopher G. Mavros <[cgmavros@zarwin.com](mailto:cgmavros@zarwin.com)>; Budner, Michael <[MBudner@smbb.com](mailto:MBudner@smbb.com)>; Jessica Agger <[jagger@zarwin.com](mailto:jagger@zarwin.com)>; Matthew Pilsner <[matthew.pilsner@bipc.com](mailto:matthew.pilsner@bipc.com)>; Howard, Ty <[thoward@bradley.com](mailto:thoward@bradley.com)>; Tara Klingensmith <[tara.klingensmith@bipc.com](mailto:tara.klingensmith@bipc.com)>; Robinson, Michelle <[mrubinson@smbb.com](mailto:mrubinson@smbb.com)>; Bell, Andy <[abell@bradley.com](mailto:abell@bradley.com)>; Duffy, Andrew R. <[ADuffy@smbb.com](mailto:ADuffy@smbb.com)>

**Cc:** Chante DePersia <[cndepersia@zarwin.com](mailto:cndepersia@zarwin.com)>

**Subject:** RE: Chappell v Precision Forum's request for deposition dates in December 2024

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All:

My trial that was set for 12/2 has been moved to the week of 12/9, which will likely go the full week and would jeopardize proceeding on 12/12 and 12/13.

We have already mediated the case with no success and we are No. 1 on the docket.

Given the vagaries of trial, I don't have a problem noticing the deposition with the understanding that if I am still in trial, that they will need to be postponed.

Jeff

**Jeff Davis**

Partner | [Bradley](#)  
[jsdavis@bradley.com](mailto:jsdavis@bradley.com)  
d: 713.576.0370

**From:** Amy L. Barrette <[amy.barrette@bipc.com](mailto:amy.barrette@bipc.com)>

**Sent:** Tuesday, November 5, 2024 9:38 AM

**To:** Christopher G. Mavros <[cgmavros@zarwin.com](mailto:cgmavros@zarwin.com)>; Budner, Michael <[MBudner@smbb.com](mailto:MBudner@smbb.com)>; Jessica Agger <[jagger@zarwin.com](mailto:jagger@zarwin.com)>; Davis, Jeff <[jsdavis@bradley.com](mailto:jsdavis@bradley.com)>; Matthew Pilsner <[matthew.pilsner@bipc.com](mailto:matthew.pilsner@bipc.com)>; Howard, Ty <[thoward@bradley.com](mailto:thoward@bradley.com)>; Tara Klingensmith <[tara.klingensmith@bipc.com](mailto:tara.klingensmith@bipc.com)>; Robinson, Michelle <[mrubinson@smbb.com](mailto:mrubinson@smbb.com)>; Bell, Andy <[abell@bradley.com](mailto:abell@bradley.com)>; Duffy, Andrew R. <[ADuffy@smbb.com](mailto:ADuffy@smbb.com)>

**Cc:** Chante DePersia <[cndepersia@zarwin.com](mailto:cndepersia@zarwin.com)>

**Subject:** RE: Chappell v Precision Forum's request for deposition dates in December 2024

Neither I nor Coterra has any control over Mr. Brown's schedule at this point, so I cannot guarantee he will be available during the 12<sup>th</sup>- 17<sup>th</sup>, or at any time in December. If all counsel could give me their availability for the 12<sup>th</sup> through the 17<sup>th</sup>, that would be a great start.

**Amy Barrette**  
Shareholder  
(she/her)

Union Trust Building  
501 Grant Street, Suite 200  
Pittsburgh, PA 15219-4413  
412 562 1626 (o)  
[amy.barrette@bipc.com](mailto:amy.barrette@bipc.com)

## Buchanan

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**From:** Christopher G. Mavros <[cgmavros@zarwin.com](mailto:cgmavros@zarwin.com)>

**Sent:** Monday, November 4, 2024 2:51 PM

**To:** Amy L. Barrette <[amy.barrette@bipc.com](mailto:amy.barrette@bipc.com)>; Budner, Michael <[MBudner@smbb.com](mailto:MBudner@smbb.com)>; Jessica Agger <[jagger@zarwin.com](mailto:jagger@zarwin.com)>; Davis, Jeff <[jsdavis@bradley.com](mailto:jsdavis@bradley.com)>; Matthew Pilsner <[matthew.pilsner@bipc.com](mailto:matthew.pilsner@bipc.com)>; Howard, Ty <[thoward@bradley.com](mailto:thoward@bradley.com)>; Tara Klingensmith <[tara.klingensmith@bipc.com](mailto:tara.klingensmith@bipc.com)>; Robinson, Michelle <[mrubinson@smbb.com](mailto:mrubinson@smbb.com)>; Bell, Andy <[abell@bradley.com](mailto:abell@bradley.com)>; Duffy, Andrew R. <[ADuffy@smbb.com](mailto:ADuffy@smbb.com)>

**Cc:** Chante DePersia <[cndepersia@zarwin.com](mailto:cndepersia@zarwin.com)>

**Subject:** Re: Chappell v Precision Forum's request for deposition dates in December 2024

Thanks, Amy. Would be good to schedule these on the same day if possible.



**Christopher G. Mavros, Esq.**

One Commerce Square  
2005 Market Street | 16<sup>th</sup> Floor | Philadelphia, PA 19103-7042  
Main Number: 215-569-2800

Direct Fax: 267-765-

Direct Dial: 267-765-7341 0346

Email: [cgmavros@zarwin.com](mailto:cgmavros@zarwin.com)



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**From:** Amy L. Barrette <[amy.barrette@bipc.com](mailto:amy.barrette@bipc.com)>  
**Sent:** Monday, November 4, 2024 2:29 PM  
**To:** Budner, Michael <[MBudner@smbb.com](mailto:MBudner@smbb.com)>; Christopher G. Mavros <[cgmavros@zarwin.com](mailto:cgmavros@zarwin.com)>; Jessica Agger <[jagger@zarwin.com](mailto:jagger@zarwin.com)>; Davis, Jeff <[jsdavis@bradley.com](mailto:jsdavis@bradley.com)>; Matthew Pilsner <[matthew.pilsner@bipc.com](mailto:matthew.pilsner@bipc.com)>; Howard, Ty <[thoward@bradley.com](mailto:thoward@bradley.com)>; Tara Klingensmith <[tara.klingensmith@bipc.com](mailto:tara.klingensmith@bipc.com)>; Robinson, Michelle <[mrubinson@smbb.com](mailto:mrubinson@smbb.com)>; Bell, Andy <[abell@bradley.com](mailto:abell@bradley.com)>; Duffy, Andrew R. <[ADuffy@smbb.com](mailto:ADuffy@smbb.com)>  
**Cc:** Chante DePersia <[cndepersia@zarwin.com](mailto:cndepersia@zarwin.com)>; Amy L. Barrette <[amy.barrette@bipc.com](mailto:amy.barrette@bipc.com)>  
**Subject:** RE: Chappell v Precision Forum's request for deposition dates in December 2024

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Counsel,

Mr. Estes is available for his deposition on the following dates: 12/12, 12/13, 12/16, or 12/17. Please confirm by the end of the week whether any of those dates work for you so that we can lock this in place before his schedule changes. I should have dates for Mr. Brown shortly.

Amy

**Amy Barrette**  
Shareholder  
(she/her)

Union Trust Building  
501 Grant Street, Suite 200  
Pittsburgh, PA 15219-4413  
412 562 1626 (o)  
[amy.barrette@bipc.com](mailto:amy.barrette@bipc.com)

**Buchanan**

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**From:** Budner, Michael <[MBudner@smbb.com](mailto:MBudner@smbb.com)>  
**Sent:** Friday, November 1, 2024 3:12 PM  
**To:** Christopher G. Mavros <[cgmavros@zarwin.com](mailto:cgmavros@zarwin.com)>; Amy L. Barrette <[amy.barrette@bipc.com](mailto:amy.barrette@bipc.com)>;

Jessica Agger <[jagger@zarwin.com](mailto:jagger@zarwin.com)>; Davis, Jeff <[jsdavis@bradley.com](mailto:jsdavis@bradley.com)>; Matthew Pilsner <[matthew.pilsner@bipc.com](mailto:matthew.pilsner@bipc.com)>; Howard, Ty <[thoward@bradley.com](mailto:thoward@bradley.com)>; Tara Klingensmith <[tara.klingensmith@bipc.com](mailto:tara.klingensmith@bipc.com)>; Robinson, Michelle <[mrubinson@smbb.com](mailto:mrubinson@smbb.com)>; Bell, Andy <[abell@bradley.com](mailto:abell@bradley.com)>; Duffy, Andrew R. <[ADuffy@smbb.com](mailto:ADuffy@smbb.com)>

**Cc:** Chante DePersia <[cndepersia@zarwin.com](mailto:cndepersia@zarwin.com)>

**Subject:** RE: Chappell v Precision Forum's request for deposition dates in December 2024

That's fine with me, as well. Thanks.

**Michael Budner**

Partner



One Liberty Place, 1650 Market Street, 52<sup>nd</sup> Floor  
Philadelphia, PA 19103  
+1 215.575.3875 (office) | +1 215.380.9312 (cell)  
[mbudner@smbb.com](mailto:mbudner@smbb.com) | [www.smbb.com](http://www.smbb.com)

**From:** Christopher G. Mavros <[cgmavros@zarwin.com](mailto:cgmavros@zarwin.com)>

**Sent:** Friday, November 1, 2024 2:04 PM

**To:** Amy L. Barrette <[amy.barrette@bipc.com](mailto:amy.barrette@bipc.com)>; Jessica Agger <[jagger@zarwin.com](mailto:jagger@zarwin.com)>; Davis, Jeff <[jsdavis@bradley.com](mailto:jsdavis@bradley.com)>; Matthew Pilsner <[matthew.pilsner@bipc.com](mailto:matthew.pilsner@bipc.com)>; Budner, Michael <[MBudner@smbb.com](mailto:MBudner@smbb.com)>; Howard, Ty <[thoward@bradley.com](mailto:thoward@bradley.com)>; Tara Klingensmith <[tara.klingensmith@bipc.com](mailto:tara.klingensmith@bipc.com)>; Robinson, Michelle <[mrubinson@smbb.com](mailto:mrubinson@smbb.com)>; Bell, Andy <[abell@bradley.com](mailto:abell@bradley.com)>; Duffy, Andrew R. <[ADuffy@smbb.com](mailto:ADuffy@smbb.com)>

**Cc:** Chante DePersia <[cndepersia@zarwin.com](mailto:cndepersia@zarwin.com)>

**Subject:** Re: Chappell v Precision Forum's request for deposition dates in December 2024

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Amy, I am fine with these deps being conducted remotely. Thanks



**Christopher G. Mavros, Esq.**

One Commerce Square  
2005 Market Street | 16<sup>th</sup> Floor | Philadelphia, PA 19103-7042  
Main Number: 215-569-2800

Direct Fax: 267-765-

Direct Dial: 267-765-7341 0346

Email: [cgmavros@zarwin.com](mailto:cgmavros@zarwin.com)



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**From:** Amy L. Barrette <[amy.barrette@bipc.com](mailto:amy.barrette@bipc.com)>  
**Sent:** Thursday, October 31, 2024 11:43 AM  
**To:** Jessica Agger <[jagger@zarwin.com](mailto:jagger@zarwin.com)>; Davis, Jeff <[jsdavis@bradley.com](mailto:jsdavis@bradley.com)>; Matthew Pilsner <[matthew.pilsner@bipc.com](mailto:matthew.pilsner@bipc.com)>; Budner, Michael <[MBudner@smbb.com](mailto:MBudner@smbb.com)>; Howard, Ty <[thoward@bradley.com](mailto:thoward@bradley.com)>; Tara Klingensmith <[tara.klingensmith@bipc.com](mailto:tara.klingensmith@bipc.com)>; Robinson, Michelle <[mrubinson@smbb.com](mailto:mrubinson@smbb.com)>; Bell, Andy <[abell@bradley.com](mailto:abell@bradley.com)>; Duffy, Andrew R. <[ADuffy@smbb.com](mailto:ADuffy@smbb.com)>; Christopher G. Mavros <[cgmavros@zarwin.com](mailto:cgmavros@zarwin.com)>  
**Cc:** Chante DePersia <[cndepersia@zarwin.com](mailto:cndepersia@zarwin.com)>  
**Subject:** Chappell v Precision Forum's request for deposition dates in December 2024

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Counsel,

Given the holidays, December is not ideal for the depositions, but I will work on dates. There are logistical issues. Mr. Estes's office is in Texas. If he has to travel, that will impact his available dates. Do all counsel agree to conduct his deposition via video? If not, I propose the deposition be held at Buchanan's office in Pittsburgh. This location will be easier for everyone traveling. That beats everyone having to travel to Susquehanna County.

Please let me know as soon as possible.

**Amy Barrette**  
Shareholder  
(she/her)

Union Trust Building  
501 Grant Street, Suite 200  
Pittsburgh, PA 15219-4413  
412 562 1626 (o)



[amy.barrette@bipc.com](mailto:amy.barrette@bipc.com)

## Buchanan

[vCard](#) | [Bio](#) | [BIPC.com](#) | [Twitter](#) | [LinkedIn](#)

**From:** Jessica Agger <[jagger@zarwin.com](mailto:jagger@zarwin.com)>

**Sent:** Thursday, October 31, 2024 8:34 AM

**To:** Davis, Jeff <[jsdavis@bradley.com](mailto:jsdavis@bradley.com)>; Matthew Pilsner <[matthew.pilsner@bipc.com](mailto:matthew.pilsner@bipc.com)>; Budner, Michael <[MBudner@smbb.com](mailto:MBudner@smbb.com)>; Amy L. Barrette <[amy.barrette@bipc.com](mailto:amy.barrette@bipc.com)>; Howard, Ty <[thoward@bradley.com](mailto:thoward@bradley.com)>; Tara Klingensmith <[tara.klingensmith@bipc.com](mailto:tara.klingensmith@bipc.com)>; Robinson, Michelle <[mrubinson@smbb.com](mailto:mrubinson@smbb.com)>; Bell, Andy <[abell@bradley.com](mailto:abell@bradley.com)>; Duffy, Andrew R. <[ADuffy@smbb.com](mailto:ADuffy@smbb.com)>

**Cc:** Christopher G. Mavros <[cgmavros@zarwin.com](mailto:cgmavros@zarwin.com)>; Chante DePersia <[cndepersia@zarwin.com](mailto:cndepersia@zarwin.com)>

**Subject:** RE: #44410 Chappell - Discovery Requests

Good Morning Counsel,

We are withdrawing our requests to Cabot. We would like to schedule depositions of Shane Brown & Frank Estes. Please let me know availability for December.

Thank you!



**Jessica Agger, Paralegal**

One Commerce Square  
2005 Market Street | 16<sup>th</sup> Floor | Philadelphia, PA 19103-7042  
Direct Dial: [215.569.2800](tel:215.569.2800) |  
Email: [jagger@zarwin.com](mailto:jagger@zarwin.com)



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**From:** Jessica Agger

**Sent:** Friday, October 25, 2024 9:56 AM

**To:** Davis, Jeff <[jsdavis@bradley.com](mailto:jsdavis@bradley.com)>; Matthew Pilsner <[matthew.pilsner@bipc.com](mailto:matthew.pilsner@bipc.com)>; Budner, Michael <[MBudner@smbb.com](mailto:MBudner@smbb.com)>; Amy L. Barrette <[amy.barrette@bipc.com](mailto:amy.barrette@bipc.com)>; Howard, Ty <[thoward@bradley.com](mailto:thoward@bradley.com)>; Tara Klingensmith <[tara.klingensmith@bipc.com](mailto:tara.klingensmith@bipc.com)>; Robinson, Michelle <[mrubinson@smbb.com](mailto:mrubinson@smbb.com)>; Bell, Andy <[abell@bradley.com](mailto:abell@bradley.com)>; Duffy, Andrew R. <[ADuffy@smbb.com](mailto:ADuffy@smbb.com)>

**Cc:** Christopher G. Mavros <[cgmavros@zarwin.com](mailto:cgmavros@zarwin.com)>; Chante DePersia <[cndepersia@zarwin.com](mailto:cndepersia@zarwin.com)>

**Subject:** #44410 Chappell - Discovery Requests

Good Morning,

Attached please find Defendant, Forum Tech's discovery requests directed to all parties.

Thank you!



**Jessica Agger, Paralegal**

One Commerce Square  
2005 Market Street | 16<sup>th</sup> Floor | Philadelphia, PA 19103-7042  
Direct Dial: [215.569.2800](tel:215.569.2800) |  
Email: [jagger@zarwin.com](mailto:jagger@zarwin.com)



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